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Slip Nos. CU 1001 and K 66034 issued to the  
Roman Catholic Archbishop of San Francisco,  
and Nos. K 78138 and CU 3061 issued to the  
Roman Catholic Bishop of Oakland*

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

In re:

THE ROMAN CATHOLIC BISHOP OF  
OAKLAND, a California corporation sole,

Debtor.

Bankruptcy Case No.: 23-40523 WJL

Chapter 11

**CERTAIN UNDERWRITERS AT  
LLOYD'S, LONDON'S EVIDENTIARY  
OBJECTIONS TO DECLARATION OF  
ERIKA J. SCOTT**

Judge: Hon. William J. Lafferty  
Hearing Date: December 13, 2023  
Hearing Time: 10:30 a.m.  
Place: United States Bankruptcy Court  
1300 Clay Street, Courtroom 220  
Oakland, CA 94612

Certain Underwriters at Lloyd's, London, subscribing severally and not jointly to Slip Nos. CU 1001 and K 66034 issued to the Roman Catholic Archbishop of San Francisco, and Nos. K 78138 and CU 3061 issued to the Roman Catholic Bishop of Oakland (collectively, "London Market Insurers" or "LMI"), by and through their undersigned counsel, respectfully submit their evidentiary objections to the Declaration of Erika J. Scott.

**OBJECTIONS TO DECLARATION OF ERIKA J. SCOTT**

Objection No.	Allegation Objected To	Objection	Court's Ruling:
1.	¶ 4: Prior to the filing of the bankruptcy case herein, our firm timely filed a complaint alleging sexual abuse against the Roman Catholic Bishop of Oakland ("RCBO") in the Alameda Superior Court for each of the WBS Claimants. Each of these cases was added into the coordinating proceeding JCCP 5108 Northern California clergy cases. Each of the complaint numbers and the identification information of the John Doe/Jane Doe plaintiffs given by the JCCP action for each of the WBS Claimants is also set out in <b><u>Exhibit "A"</u></b> .	<b>Lack of Foundation</b> (Fed. R. Evid. 901); <b>Lack of Authentication</b> (Fed. R. Evid. 901); <b>Hearsay</b> (Fed. R. Evid. 801); <b>Speculation and Lack of Personal Knowledge</b> (Fed. R. Evid. 602); <b>Improper Legal Conclusion</b> (Fed. R. Evid. 701);	Sustained ____ Overruled ____
2.	¶ 8: Our firm uses a computer calendaring software program called Firm Central. Firm Central syncs to each individual Outlook calendar of firm members. Our firmwide practice for deadlines such as statutes of limitation is for our office manager to calendar them within Firm Central, color-coded red which is only used for statutes of limitation. The statutes of limitation are also added to a manual list that is routinely audited.	<b>Lack of Foundation</b> (Fed. R. Evid. 901); <b>Lack of Authentication</b> (Fed. R. Evid. 901); <b>Hearsay</b> (Fed. R. Evid. 801); <b>Speculation and Lack of Personal Knowledge</b> (Fed. R. Evid. 602); <b>Improper Legal Conclusion</b> (Fed. R. Evid. 701);	Sustained ____ Overruled ____
3.	¶ 9: The deadline for filing the proofs of claim in the RCBO bankruptcy case was calendared in Firm Central by my legal assistant and associated with a single matter for all the WBS Claimants. That matter, which was created to reflect the RCBO bankruptcy proceeding, was not synced to any attorney or	<b>Lack of Foundation</b> (Fed. R. Evid. 901); <b>Lack of Authentication</b> (Fed. R. Evid. 901); <b>Hearsay</b> (Fed. R. Evid. 801); <b>Speculation and Lack of Personal Knowledge</b> (Fed. R. Evid. 602); <b>Improper</b>	Sustained ____ Overruled ____

Objection No.	Allegation Objected To	Objection	Court's Ruling:
	staff members' calendar. The deadline was not calendared as a statute of limitation as would normally have been calendared at our firm.	<b>Legal Conclusion</b> (Fed. R. Evid. 701);	
4.	¶ 10: During my maternity leave, I routinely checked with my associate handling the WBS Claimants and was aware of the proofs of claim deadline, although I was not logging into our firm's system during my leave and did not access to our calendar. My associate was responsible for preparing all of the WBS Claimants proofs of claim for my review prior to submission to the bankruptcy court.	<b>Lack of Foundation</b> (Fed. R. Evid. 901); <b>Lack of Authentication</b> (Fed. R. Evid. 901); <b>Hearsay</b> (Fed. R. Evid. 801); <b>Speculation and Lack of Personal Knowledge</b> (Fed. R. Evid. 602); <b>Improper Legal Conclusion</b> (Fed. R. Evid. 701);	Sustained ____ Overruled ____
5.	¶ 11: On August 29, 2023, while still on maternity leave, I logged in to review all of the proofs of claim that had been prepared by my associate. I sent minor edits, signed off on them and generally approved them for filing. Each of the proofs of claim for the WBS Claimants contained the information necessary for their evaluation as sexual abuse claims in this Chapter 11 case, including the optional supplemental statements provided in the form Proof of Claim approved by the court.	<b>Lack of Foundation</b> (Fed. R. Evid. 901); <b>Lack of Authentication</b> (Fed. R. Evid. 901); <b>Hearsay</b> (Fed. R. Evid. 801); <b>Speculation and Lack of Personal Knowledge</b> (Fed. R. Evid. 602); <b>Improper Legal Conclusion</b> (Fed. R. Evid. 701);	Sustained ____ Overruled ____
6.	¶ 12: On the morning of September 12, 2023, my associate informed me that the proof of claim deadline was missed and that the claims were not filed with the claims agent by the deadline. Despite all of the WBS Claimants claims being finalized and ready for filing, my associate failed to file or direct my legal assistant to file them.	<b>Lack of Foundation</b> (Fed. R. Evid. 901); <b>Lack of Authentication</b> (Fed. R. Evid. 901); <b>Hearsay</b> (Fed. R. Evid. 801); <b>Speculation and Lack of Personal Knowledge</b> (Fed. R. Evid. 602); <b>Improper Legal Conclusion</b> (Fed. R. Evid. 701);	Sustained ____ Overruled ____
7.	¶ 13: Because they were not calendared as a statute of limitation, our internal process to prevent this exact occurrence did not function properly. When I was made aware of this, I instructed my associate and my legal assistant	<b>Lack of Foundation</b> (Fed. R. Evid. 901); <b>Lack of Authentication</b> (Fed. R. Evid. 901); <b>Hearsay</b> (Fed. R. Evid. 801); <b>Speculation and Lack of Personal</b>	Sustained ____ Overruled ____

Objection No.	Allegation Objected To	Objection	Court's Ruling:
	immediately to file all claims on September 12, 2023 within 24 hours of the original deadline and the filing of all of the claims was completed that same date.	<b>Knowledge</b> (Fed. R. Evid. 602); <b>Improper Legal Conclusion</b> (Fed. R. Evid. 701);	

Dated: December 6, 2023

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